

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
DANVILLE DIVISION

UNITED STATES OF AMERICA )

v. )

STEVIE JERMAINE JOHNSON, JR. )  
a/k/a "Stevie" )

Criminal No.: 4:18-cr-000 36

**STATEMENT OF FACTS**

The parties stipulate that the allegations contained in Count 1 of the Information and the following facts are true and correct, and that had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt.

At all times relevant to the Information, STEVIE JERMAINE JOHNSON, JR., a/k/a "Stevie," (hereinafter "JOHNSON") was a member of the criminal organization, the Rollin 60s Crips ("Rollin 60s"), which is a street gang. Since at least sometime in or about 2015, the Rollin 60s have been active in the Western District of Virginia and have engaged in criminal activity, including but not limited to murder and attempted murder, assault resulting in bodily injury, assault with a dangerous weapon, robbery, obstruction of justice, drug distribution and trafficking, and conspiracy to commit those crimes.

The Rollin 60s, including its leadership, membership, and associates, constitutes an "enterprise" as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated-in-fact. The enterprise constitutes an ongoing organization whose members function as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise has engaged in, and its activities have affected, interstate and foreign commerce.

The purposes of the enterprise, of which JOHNSON was a member, include promoting and enhancing the enterprise, and enriching its members and associates through, among other things, acts of violence, including murder, trafficking in firearms, and trafficking in controlled substances, and the enforcement of discipline among the members; to providing assistance to members of the enterprise who committed crimes for and on behalf of the enterprise; and to thwarting efforts of law enforcement to apprehend enterprise members.

At all relevant times, JOHNSON was a member of the Rollin 60s. JOHNSON was involved in murders and attempted murders committed by the enterprise, as well as drug trafficking committed by the enterprise.

Defendant's Initials: JSJ

From some date in 2015, in the Western District of Virginia and elsewhere, JOHNSON, while associated with the Rollin 60s, did knowingly and intentionally conspire and agree with other members or associates of the Rollin 60s to conduct and participate in, directly and indirectly, the affairs of the Rollin 60s through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and 1961(5), including but not limited to murder and attempted murder, gun trafficking, robberies, obstruction of justice, and conspiracy to distribute controlled substances.

In furtherance of the conspiracy and to achieve its objectives, JOHNSON performed and caused to be performed certain racketeering acts in the Western District of Virginia and elsewhere. The racketeering acts performed by JOHNSON included, but are not limited to:

A. Meeting of the Milla Bloods and the Rollin 60s Crips

On or about August 19, 2016, members of the Milla Bloods and Rollin 60s Crips agreed to and met at the residence of Sticcs' mother on Forestlawn Drive in Danville, Virginia, which is located in the Western District of Virginia. "Sticcs" is the nickname for Marcus Davis, who is a member and the "Big Homie" of the Rollin 60s Crips in Danville. At the meeting, Milla Bloods gang members were present, including the following:

Javontay Holland (aka Tay)  
Melik Smith (aka Shoota)  
Jermay Smith (aka Little Trill)  
DeShawn Anthony (aka Shon Don)  
Tredarius Keene (aka Bubba or Bubs)  
Wydarius Brandon (aka Gleesh or D)  
Demetrius Staten (aka Truck)  
Jalen Terry (aka Fats)

Also at the meeting, Rollin 60s Crips gang members were present, including the following:

Stevie Johnson (aka No Good)  
Laquante Adams (aka Spazz or Quante)  
Brian Crutchfield (aka Crutch)  
Tyson Bowens (aka Ty Sav or Tay Banks)  
Phillip Miles (aka R)  
Deshaun Trent (aka Six)  
Kanas Trent (aka LA)  
Shabba Chandler (aka Trill)  
Marcus Davis (aka Sticcs)

Defendant's Initials: JS

At the meeting, Davis and Anthony discussed different topics and issues, including that the two gangs should work together and that the gang members had authority to shoot to kill members of the rival Billys gang.

B. Murder of Christopher Motley and Attempted Murder of Justion Wilson  
(August 20, 2016)

In the summer of 2016, members of the Rollin 60s and Milla Bloods street gang “tied the flag” in order to facilitate their criminal activities in the Danville, Virginia area at the expense of a rival Bloods gang called the Billys, which is a set of the 9-Trey Bloods. At some point JOHNSON conspired with members of his own gang and members of the Milla Bloods to kill the head of the Billys (Stevie Wallace aka “Peter Roll”) on August 20, 2016, and in the days around that date.

On August 20, 2016, multiple meetings occurred between members of the Rollin 60s and the Milla Bloods. At least one of these meetings occurred at the apartment of Ashley Ross, who is an associate or member of the Rollin 60s. Ross’s apartment is located in the Southwyck Apartment complex, which is in Danville, Virginia and which is located in the Western District of Virginia. In general, the plan was to lure Wallace (and his second-in-command) to Southwyck Apartments, where various gang members were fanned out around the complex and an adjoining parking lot, armed and prepared to shoot Wallace to death.

At approximately 10:20 p.m., on August 20, 2016, a van drove into the apartment complex, which caused multiple gang members to begin shooting from different directions. At least two of these individuals were standing in the window of Ross’s apartment, which faces the parking lot. JOHNSON was also in Ross’s apartment at the outset of the shooting. Other gang members were located in various locations in front of and adjacent to the apartment buildings and parking lot, and some gang members were located near a trash dumpster in the parking lot in front of Ross’s apartment. One of the occupants of the van, Christopher Motley, was killed in the gunfire. The driver of the van, Justion Wilson, was not injured.

After the murder, the shooters fled into apartments in the apartment complex, including JOHNSON, and from the Southwyck Apartments to various locations in and around Danville, Virginia.

C. Conspiracy to Distribute Controlled Substances

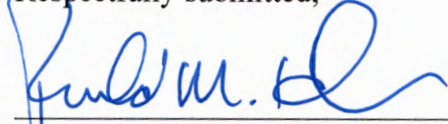
During and in furtherance of the conspiracy, JOHNSON conspired with others to distribute, and did in fact distribute, marijuana on behalf of the racketeering enterprise.

Each of the acts set forth in paragraphs A, B, and C above furthered the goals and objectives of the enterprise by enriching JOHNSON and its members, and enhancing the status of JOHNSON and others within the organization.

Defendant's Initials: JS

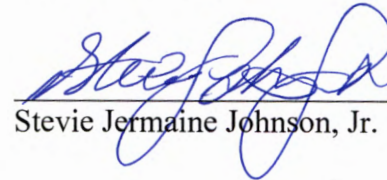
The actions taken by JOHNSON as described above were taken willfully, knowingly, and with the specific intent to violate the law. JOHNSON did not take those actions by accident, mistake, or with the belief that they did not violate the law. JOHNSON acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity.

Respectfully submitted,



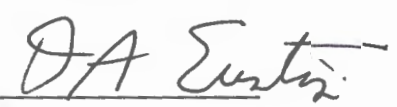
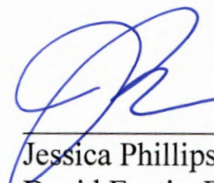
Ronald M. Huber  
Heather L. Carlton  
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Stevie Jermaine Johnson, Jr.

We are Stevie Jermaine JOHNSON, Jr's attorneys. We have carefully reviewed the above Statement of Facts with him. To our knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Jessica Phillips, Esq.  
David Eustis, Esq.  
Counsel for Defendant

Defendant's Initials. SJ